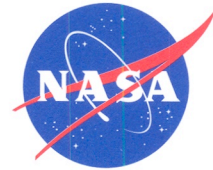


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001

September 15, 2011



Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at a Reception and Dinner, hosted by Partnership for Public Service on September 15, 2011

On September 15, 2011, Partnership for Public Service (PPS), a non-profit organization under Section 501(c)(3) of the IRS Code, will host a reception and dinner at the Andrew Mellon Auditorium in Washington, D.C., from 5:30 pm – 9:30 pm. PPS is the exclusive host and presenter of the Service to America Medals Gala. Cosponsors of this event include Bloomberg Government, Booz Allen Hamilton, CH2MHILL, Chevron, Dupont, United Technologies Corporation, Citibank, EADS North America, Ernst & Young, The Boston Consulting Group, Cisco Systems, ForeSee Results, McKinsey & Company, Grant Thornton LLP, Palantir Technologies, Aon Hewitt, FedChoice Federal Credit Union, IBM, RFI Foundation, and Skadden, Arps, Slate, Meagher & Flom LLP.

This reception and dinner will include representatives of the aerospace industry, various Federal agencies, the White House, Members of Congress and staff, private sector sponsors, media, and other partners and supporters of public service. The event will celebrate excellence in public service through the presentation of the 2011 Samuel J. Heyman Service to America Medals. Approximately 1500 people were invited to attend. The estimated cost of the reception and dinner, which includes all food and beverages, is \$56 per person. PPS is solely responsible for selecting, inviting, and seating of invited NASA guests. I find that the event meets the requirements of a "widely-attended gathering" as defined in 5 C.F.R. §2635.204(g)(2).

I have determined that free attendance at the above-mentioned event is in the interest of the Agency because it will further agency programs and operations through the exchange of views and information. Accordingly, NASA employees whose duties do not substantially affect the event sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event for themselves and their accompanying guest.

However, NASA employees whose duties may substantially affect the event sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. §2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

*Kathleen T. Spear*

for Adam F. Greenstone